

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE**

JOLETTA L. JACKSON,

Plaintiff,

v.

Civil Action No. _____

TRACY M. KEY and
LANDSTAR RANGER, INC.,

Defendants.

JOINT NOTICE OF REMOVAL

TO THE HONORABLE JUDGES IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE:

COME NOW Defendants Tracy M .Key (“Key”), and Landstar Ranger, Inc. (“Landstar”) by and through counsel, and respectfully aver as follows:

1. On April 14, 2022 Plaintiff Joletta L. Jackson (“Plaintiff”) commenced a civil action against Defendants in the Circuit Court for Shelby County, Tennessee. A Copy of the Complaint is attached hereto at **Exhibit A**.

2. The Complaint, being the original process in this cause, was first received by Landstar no earlier than April 26, 2022.

3. The Complaint, being the original process in this cause, was first received by Key no earlier than May 6, 2022.

4. This personal-injury lawsuit arises out of a July 15, 2021 accident alleged to have occurred within the boundaries of Shelby County, Tennessee. See **Ex. A**, Compl. ¶ 9.

5. The *ad damnum* included in the Complaint is in an amount exceeding \$75,000. See **Ex. A**, Compl.

6. At all times material hereto, Plaintiff was and is a citizen and resident of Shelby County, Tennessee. See Ex. A, Compl. ¶ 1.

7. At all times material hereto, Key was and is a citizen and resident of DeSoto County, Mississippi. See Ex. A, Compl. ¶ 2.

8. At all times material hereto Landstar was and is a foreign corporation, incorporated in Delaware with its principal place of business in Florida. See Ex. A, Compl. ¶ 3.

9. Diversity of citizenship within the meaning of 28 U.S.C. § 1332 exists because:

- (a) Plaintiff was and remains a citizen and resident of Tennessee;
- (b) Defendant Key was and remains a citizen and resident of Mississippi; and
- (c) Defendant Landstar was and is a foreign corporation.

10. Diversity of citizenship existed at the time the action sought to be removed was commenced and continues through the time of filing of this notice, such that Defendants are entitled to removal pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446.

11. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332 because, based on the nature of the injuries alleged by Plaintiff in the Complaint along with Plaintiff's specific *ad damnum*, the amount in controversy exceeds the sum of \$75,000.00.

12. It has been less than thirty (30) days since Defendant Landstar was served with the Summons and Complaint.

13. It has been less than thirty (30) days since Defendant Key was served with the Summons and Complaint.

14. Defendants both desire and consent to the joint removal of the above-captioned action, now pending in the Circuit Court of Shelby County, Tennessee to this Honorable Court pursuant to 28 U.S.C. § 1446.

WHEREFORE, Defendants Tracy M. Key and Landstar Ranger, Inc. jointly pray that the above-captioned action, now pending in the Circuit Court of Shelby County, Tennessee, be removed to this Honorable Court.

Respectfully submitted,

s/ J. Lewis Wardlaw

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*Defendants Tracy M. Key and
Landstar Ranger, Inc.*

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing has been served upon counsel for the Plaintiff, via electronic mail and regular mail, postage pre-paid on this the 9th day of May, 2022.

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s/ J. Lewis Wardlaw